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Attorney for ROBERT G. TUNNELL, JR.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT G. TUNNELL, JR.,

Defendant.

CASE NO. CR 11-0463 CRB (EDL)

**STIPULATION AND ~~PROPOSED~~
ORDER MODIFYING CONDITIONS OF
PRE-TRIAL RELEASE TO PERMIT
CONTACT WITH INDIVIDUALS NOT
IDENTIFIED ON THE “NO-CONTACT
LIST” PROVIDED TO PROBATION**

STIPULATION

Defendant Robert G. Tunnell, Jr., by and through his counsel, Edward W. Swanson, and the United States, by and through Assistant United States Attorney W. Douglas Sprague, hereby stipulate and agree as follows:

1. On June 24, 2011, the Court set conditions of release for defendant Robert G. Tunnell, Jr., one of which was a condition that he have “no direct or indirect contact with former or current investors...”

4. On April 25, 2012, counsel for Mr. Tunnell provided the “no-contact list” to the Probation Office pursuant to Special Condition number 8.

6. The individuals whose names appear on the “no-contact list” are: Karen Arcuri, Nan Brown, Jim Donohue, Linda Donohue, Erin Grey, Rebecca Hazard, Suzanne Riley, Gary Woodworth, Kitty Woodworth, Joanne Zaremba.

8. Pretrial Services Officer Josh Libby has no objection to the proposed modification.

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IT IS SO STIPULATED.

DATED: May 2, 2012

/s/
DOUG SPRAGUE
Assistant United States Attorney

/s/
EDWARD W. SWANSON
Swanson & McNamara LLP
Attorneys for ROBERT G. TUNNELL

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: May 2, 2012

